EXHIBIT G

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May 7, 2012

VIA ELECTRONIC MAIL

Robert A. Mittelstaedt, Esq.
Jones Day
555 California Street
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San Francisco, CA 94104

> **Re:** *In re: High-Tech Employee Antitrust Litigation,*
> **Master Dkt. No. 11-cv-2509 (N.D. Cal.)**

Dear Mr. Mittelstaedt:

I write on behalf of Plaintiffs in the above-captioned matter in response to Intuit Inc.'s ("Intuit") production of data with the following file names:

> Intuit Attorneys' Eyes Only RTD2 – Offers; and
> Intuit Attorneys' Eyes Only RTD2 – Hires.

First, please let us know by tomorrow, May 8, 2012, when Intuit will finish producing data responsive to Plaintiffs' requests. Please note that Exhibit 1 to this letter lists categories of data that have not been produced, that were included in Plaintiffs' requests for production, and that Plaintiffs need for purposes of class certification analysis. Of particular note is that the fact Intuit has not produced any of the employee-level personnel data (that is, data other than the hiring and recruiting data mentioned in Exhibit 1) that Plaintiffs requested. In addition to the information listed in Exhibit 1 that Intuit has not yet produced, please produce the individual encrypted IDs that Defendants agreed to provide. Given the fast-approaching class certification deadlines, it is imperative that Intuit produce all relevant data immediately.

Second, Exhibit 1 contains a list of questions concerning the hiring and recruiting data that Intuit produced. Given the nature and scope of Plaintiffs' questions, Plaintiffs believe that the most productive way to address these questions would be through a teleconference involving

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Plaintiffs' counsel, a staff member of Plaintiffs' consulting expert, and a representative of Intuit who is knowledgeable about the data produced by Intuit. Please propose a time this week when Intuit will make available a person knowledgeable about the data produced in this litigation for such a teleconference.

Thank you, and please feel free to contact me with any questions.

Sincerely,

Daniel J. Walker

cc: Dean Harvey

Enclosure

Exhibit 1 to May 7, 2012 Walker Letter

I.   **Employee Data**

       A.   No employee data have been produced to date. Please produce employee-level personnel data as requested previously.

II.   **Hiring and Recruiting Data Questions and Requests Relating to:**
        Intuit Attorneys' Eyes Only RTD2 – Offers
        Intuit Attorneys' Eyes Only RTD2 – Hires

       A.   The files contain data regarding offers and hiring information for Fiscal Year 2009 through 2012, or offers extended ranging from August 1, 2008 to April 2, 2012. Please provide responsive data beginning in 2001.

       B.   The produced data are limited to candidates who were offered a position, and the data are lacking information regarding all other applicants and applications. Please provide responsive data for applications that did not result in an extended offer.

       C.   Please provide a data dictionary explaining what each field in the files represent. To the extent such a data dictionary does not exist, please explain what the following fields represent:

1. Band

2. Pay For – BU/FG

3. Report To – BU/FG

4. Pay For – Group

5. Pay For – Department

6. Pay For – Company

7. Core Process

8. Month

9. Quarter

10. Source Aggregation

11. Pay For – Segment (Hires only)

12. # of Hires/# of Hires (Hires only)

13. CCR Status (Hires only)

14. Req# – # of Hires (Hires only)

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D.   Please provide an explanation for all of the values found in the following:

        1.   Band

        2.   Core Process

E.   The field "Bonus Target %" is always blank.   Please provide the missing information to the extent it is available from other data sources.

F.   The fields listed below are not always populated. Please explain whether a blank value indicates that the field is not applicable for the observation or it indicates a missing value. Please provide any missing information to the extent it is available from other data sources.

        1.   Relocation

        2.   Reason Code

        3.   Start Date

        4.   Critical Skills

        5.   Major

        6.   School

        7.   Source Aggregation

        8.   Stock Options

        9.   Stock Units

        10. Target Incentive Amount

        11. University Program

        12. Days to Hire (Hires only)

        13. Skill Discipline (Hires only)

G.   Please provide the following additional fields:

        1.   Employer at Time of Application (only available in Hires)

        2.   Education Level

H.   The Candidate ID field appears to represent a unique candidate/applicant identifier. To the extent the ID represents a unique internal ID, please provide a

Exhibit 1 to May 7, 2012 Walker Letter

uniform and constant ID across Defendants, such as an encrypted Social Security Number, corresponding to each unique Candidate ID.

I.   Please indicate whether or not any data regarding cold-calling recruiting data were included in the data provided. If any cold-calling recruiting data were included, please explain how such data can be identified. If not, please provide cold-calling recruiting data, including the following fields:

       1.   Date of Contact

       2.   Position at Time of Contact

       3.   Years of Experience

       4.   Salary History

       5.   Resume